

## OMB Data Quality Guidelines Scientific Info Clause Removal Sought

A clause in White House Office of Management and Budget-issued data quality guidelines that would subject scientific research results to independent analysis for reproducibility should be deleted, according to comments from academic organizations.

In letters submitted to OMB Aug. 13, the Association of American Medical Colleges, the Association of American Universities and the National Association of State Universities and Land-Grant Colleges recommend the removal of language that addresses scientific research information, saying it would interfere with the peer review process and goes beyond the congressional requirement.

The guidelines, which have come to be known as the "Daughter of Shelby," are intended to ensure "quality, integrity, utility and objectivity" for information disseminated by the federal government. They were developed in response to part of the FY 2001 Consolidated Appropriations Act.

The formal comments from the academic organizations submitted to OMB follow previously expressed objections to those parts of the guidelines that interfere with the peer review process in scientific research ("The Blue Sheet" Aug. 8, p. 12). The organizations indicate they do not believe federally-supported university research should fall under the scope of the OMB notice.

The section recommended for deletion would require scientific research results to be "substantially reproducible upon independent analysis of the underlying data."

AAMC explains ensuring reproducibility is the task of the properly equipped and trained scientific community as part of a peer review process essential to scientific progress.

The association adds, "For OMB to assert reproducibility as the threshold criterion for 'quality' of scientific information would set a standard far beyond peer review and would essentially prevent federal agencies from depending, as does the entire scientific community, on the reliability of the peer-reviewed literature. A result less in the public interest is hard to imagine."

questions the guidelines' implication "there is a single bias-free position from which to assess the validity of scientific findings."

"It is counterintuitive that federal agency officials or 'affected persons'...would categorically make the most appropriately independent reviewers or referees of such information," AAMC writes.

In reference to the same phrase, AAU says if the paragraph is not deleted, questions such as "Who will perform the analysis?" and "Who will pay for it?" will have to be answered. Further questioning the feasibility of implementing the clause, AAU says, "Will there be safeguards to ensure that the parties doing this analysis are themselves objective and have scientific credibility?"

The guidelines, in responding to directions by Congress, would require agencies to "establish administrative mechanisms allowing affected persons to seek and obtain correction" of information disseminated by an agency.

In objecting to how this might apply to academic research, AAMC states information from scientific research that is disseminated by federal agencies "should not be subject to correction or amendment without stringent qualified scientific review."

The prospect that the legislation and the guidelines resulting from them could provide a means for outside interests to change or control federal dissemination of peer-reviewed information has alarmed the scientific community, AAMC remarks.

The AAU/NASULGC letter summarizes the position. "We do not believe OMB should establish procedures that could facilitate the harassment of scientists who may be investigating questions of economic or social importance, simply because someone may dislike the conclusions reached through those investigations."

The letters also agree the final guidelines should "defer as much as possible to individual federal agencies to develop standards for dissemination."

In addition to recommending deletion of the "scientific information" clause and clarification of the scope of the guidelines so that academic and other non-federal institutions receiving federal grants are removed, both sets of comments ask for the deadline for finalized guidelines to be extended from the initial date of Sept. 30. Further, AAMC calls for publication of a revised set of guidelines with a second period of public comment. ♦ ♦